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Attorneys for the United States

UNITED STATES DISTRICT COURT DISTRICT OF HAWAII

UNITED STATES OF AMERICA, Plaintiff,

V.

Civ. No. 18-145 JMS RT

SANDWICH ISLES COMMUNI-CATIONS, INC., et al., Defendants.

THE UNITED STATES OF AMERICA'S MOTION FOR ORDER APPROVING CONFIRMATION OF EXECUTION SALE

Plaintiff the United States of America ("United States") respectfully moves this Court (the "Motion") for entry of its proposed Order Approving Confirmation of Execution Sale (the "Order"). This Motion is supported by the United States' Memorandum in Support of the Motion, Declaration of Counsel, and Declaration of Channing Iwamuro, and Exhibits A-C attached hereto. Pursuant to Paragraph 5 of the Court's Order Approving Execution Sale Procedures, ECF No. 535, the Court

shall hold a hearing to consider the confirmation of the sale ("Confirmation Hearing"), at which the Court may allow further bidding after good cause shown and, after considering any objections that the sale did not comply with the Court's auction procedures, approve the sale of the property identified in the winning bid to the successful bidder. The United States requests that the Court set the Confirmation Hearing and enter the proposed Order Approving Confirmation of Execution Sale, for the reasons set forth in the Memorandum in Support of the Motion.

[Signature Page Follows]

Date: June 10, 2024 Respectfully submitted,

BRIAN BOYNTON
Principal Deputy Assistant Attorney General

CLARE E. CONNORS #7936 United States Attorney District of Hawaii

/s/ Shane Huang

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Attorneys for the United States

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2024, a true and correct copy of the

foregoing UNITED STATES OF AMERICA'S MOTION FOR ORDER

APPROVING CONFIRMATION OF EXECUTION SALE, together with the

accompanying memorandum in support, declarations, and exhibits in support

thereof, was filed with the Clerk of the Court using the CM/ECF system, which

will electronically serve all represented parties who have filed an appearance. In

addition, a copy was served via email on:

Albert S.N. Hee

Counsel for Hawaiian Telcom, Inc.

/s/ Shane Huang

SHANE HUANG

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